

LAW OFFICES OF JILL R. SHELLOW

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MEMORANDUM ENDORSED

May 11, 2023

VIA ECF ONLY

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/11/2023
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RE: *United States v. Santos (Juan Mercedes)*, 22-cr-522 (GHW)

Dear Judge Woods:

I represent Juan Mercedes in the above-referenced case. Mr. Mercedes was arrested on January 25, 2023 and released principally on a \$100,000 PRB, home incarceration and location monitoring. I am writing to request a temporary modification of Mr. Mercedes' release conditions so that he can spend Sunday, May 21, 2023 – his 27th birthday – with his 8 year-old daughter. Mr. Mercedes would like to see his barber in the morning, pick up his daughter from her grandmother in the Bronx, see a movie and have dinner with her and return his daughter to her grandmother by 9PM. Mr. Mercedes has given me the address for his barber and for his daughter's grandmother, and Pretrial Services (PTS) will have both.

I asked the AUSAs for their consent, and they said that they defer to PTS. I contacted Mr. Mercedes' PTS Officer who advised me that notwithstanding Mr. Mercedes' compliance to date, the location monitoring policy is to object to all social requests. Each social request should be viewed in the context of the specific defendant. The request is made so that Mr. Mercedes can maintain a close relationship with his daughter and show her the importance of being able to share special occasions with family.

Thank you for your consideration.

Respectfully submitted,

Jill R. Shellow

cc: AUSAs Ashley Nicholas and Andrew Jones (by ECF and Email)
Pretrial Officer Francesca Piperato (by email)
Juan Mercedes (by email)

Application denied. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 161.

SO ORDERED.

Dated: May 11, 2023
New York, New York